

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STEELWORKERS OF
AMERICA, AFL-CIO/CLC,

Plaintiff,

v.

PLIANT CORPORATION,

Defendant.

CIVIL ACTION NO. 04-12489-WGY

**DEFENDANT'S ASSENTED TO MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO THE PLAINTIFF'S COMPLAINT**

The Defendant in the above-captioned matter, Pliant Corporation ("Pliant"), submits this Assented to Motion for Extension of Time to Answer or Otherwise Respond to the Plaintiff's Complaint. In support of this Motion, the Defendant represents as follows:

1. Counsel for the Defendant, Susan G. Fentin, only recently received a copy of the Complaint.
2. The Complaint is extremely detailed and requires substantial investigation to determine an appropriate response to each allegation.
3. Attorney Fentin will be submitting a Motion for Admission of Attorney Richard L. Marcus Pro Hac Vice.
4. Attorney Marcus has contacted counsel for the Plaintiff, Nicole Horberg Decter, who represents that she has no objection to this Motion.

WHEREFORE, the Defendant respectfully requests that the deadline for answering or otherwise responding to the Complaint be extended until February 15, 2005.

Respectfully Submitted,

/s/ Susan G. Fentin

Susan G. Fentin, Esq.

BBO No. 632962

Counsel for Defendant

Skoler, Abbott & Presser, P.C.

One Monarch Place, Suite 2000

Springfield, Massachusetts 01144

Tel.: (413) 737-4753/Fax: (413) 787-1941

Dated: December 21, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above document was served upon Plaintiff's counsel, Warren H. Pyle and Nicole Horberg Decter, Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C., 18 Tremont Street, Suite 500, Boston, MA 02108, by first-class, U.S. mail, postage prepaid on December 21, 2004.

/s/ Susan G. Fentin

Susan G. Fentin, Esq.